ADDENDUM TO THE
REVISED AIR QUALITY STAFF ASSESSMENT
MOUNTAINVIEW POWER PROJECT
JANUARY 22, 2001

SUMMARY

The proposed modifications to the existing boilers systems at the MVPP facility site were included as part of the proposed project in the Staff Assessment and Revised Staff Assessment. Therefore, in the Revised Staff Assessment, staff proposed conditions requiring that the applicant control the NOx emissions from the existing boiler systems to 32 lbs/hr (as proposed by the applicant). The applicant has clarified this issue, stating that the existing boiler systems and their potential emissions are not part of the proposed project and thus should not have any conditions in the Commission license. It is staff's opinion that to eliminate the need to have NOx emission limits for the existing boiler systems, these systems need to be modeled at their current emission levels (94 lbs/hr). The applicant has performed this modeling for both the existing boilers and their associated cooling towers (letter to James Reede, January 19, 2001).

Based on staff's review of the applicant's modeling analysis, staff proposes the following changes to AIR QUALITY Table 23 of the Revised Staff Assessment.

AIR QUALITY Table 23
Facility Modeling Maximum Impacts

Pollutant	See AIR QUALITY Table #	Averaging Time	Impact ($\mu g/m^3$)	Back-Ground[1] ($\mu g/m^3$)	Total Impact ($\mu g/m^3$)	Limiting Standard ($\mu g/m^3$)	Percent of Standard
NO2	17	1-hour	~~74.0~~ 154.2	263.2	~~337.2~~ 417.4	470	~~72~~ 89
	19	Annual	~~0.61~~ 6.83	67.54	~~68.15~~ 74.37	100	~~68~~ 74
CO	17	1-hour	~~34.1~~ 34.2	5750	5784.~~1~~2	23,000	25
	17	8-hour	11.5	4444	4455.5	10,000	45
SO2	17	1-hour	~~2.50~~ 2.53	52.4	54.9	655	8
	18	24-hour	0.29	28.9	29.19	130	22
	19	Annual	~~0.08~~ 0.10	4.8	4.~~88~~90	80	6
PM10	18	**24-hour**	~~10.10~~ 10.65	148	158.~~1~~6	50	**31~~6~~7**
	19	**Annual**	~~2.01~~ 3.42	50.6	~~52.61~~ 54.02	30	**~~175~~ 180**

1 See AIR QUALITY Table 5

The modeling results in revised AIR QUALITY Table 23 demonstrate that at historic emission levels, the existing boilers system would not present a significant impact. Additionally, the value used as the background level includes emissions from the existing boiler systems. Therefore it is staff's opinion that the existing boiler systems can be run unmodified from their current condition and will not result in a significant impact on the ambient air quality.

CONCLUSIONS AND RECOMMENDATIONS

Staff modifies their previous conclusions in the Revises Staff Assessment regarding the inclusion of the existing boiler systems, their associated cooling towers and ancillary equipment. Staff concludes that these equipment are not part of the proposed MVPP and thus it is not necessary establish limiting conditions for them.

Staff recommends the following modifications to the staff proposed Conditions of Certification as submitted in the Revised Staff Assessment.

CONDITIONS OF CERTIFICATION

The following staff proposed Conditions of Certification from the Revised Staff Assessment dated December 22, 2000 are deleted:

Conditions AQ-37 through AQ-44 and
Conditions AQ-47 through AQ-55
Note: the preambles associated with these conditions are also deleted.

Staff recommends modifications for the following Conditions of Certification from the Revised Staff Assessment dated December 22, 2000, those conditions not modified are recommended by staff as they exist in the Revised Staff Assessment:

AQ-C1 The project owner shall require as a condition of its construction contracts that all contractors/subcontractors ensure that all heavy earthmoving equipment, that includes, but is not limited to bulldozers, backhoes, compactors, loaders, motor graders and trenchers, and cranes, dump trucks and other heavy duty construction related trucks, have been properly maintained and the engines tuned to the engine manufacturer's specifications. The project owner shall further require as a condition of its construction contracts that this equipment shall either (1) employ high pressure fuel injection; ~~(common rail) system or~~ (2) employ injection ~~engine~~ timing retardation to control the emissions of oxides of nitrogen; or (3) be certified to EPA off-road equipment emission standards. The project owner shall further require as a condition of its construction contracts that all diesel fired construction equipment use CARB Low-Sulfur fuel (<15ppm sulfur by weight). ~~The project owner shall further require as a condition of its construction contracts that all heavy construction equipment complies~~

~~with EPA 1996 Diesel standards.~~ The project owner shall further require as a condition of its construction contracts that all heavy construction equipment to the extent practical shall remain running at idle for no more than 5 minutes.

Verification: The project owner shall submit to the CPM, via the Monthly Compliance Report, documentation, which demonstrates that the contractor's/subcontractor's heavy earthmoving equipment is properly maintained and the engines are tuned to the manufacturer's specifications. The project owner shall maintain construction contracts on the site for six months following the start of commercial operation.

AQ-C2 The project owner shall install oxidizing soot filters on all suitable off-road construction equipment used either on the power plant construction site or associated linear construction sites for a period of atleast 10 working days. ~~Where the oxidizing soot filter is determined to be unsuitable, the owner shall install and use an oxidation catalyst.~~ Factors relevant to the suitability analysis shall include, but are not limited to, equipment size and operating time on location. Suitability is to be determined by an independent California Licensed Mechanical Engineer, ~~in consultation with the California Air Resources Board (ARB),~~ who will stamp and submit for approval an initial suitability report, after consulting with the California Air Resources Board, for each major project component; the Wastewater connector line, Natural gas supply line and the Facility site. The independent California Licensed Mechanical Engineer, ~~in~~ after consultation with ARB, shall also submit the Installation Report and all Suitability Update Reports as necessary containing at a minimum the following:

Initial Suitability Report:

- a list of all fuel burning, construction related equipment used,
- a determination of the suitability of each piece of equipment to firstly work appropriately with an oxidizing soot filter,
- a determination of the suitability of each piece of equipment to secondly work appropriately with an oxidation catalyst,
- if a piece of equipment is determined to be unsuitable for an oxidizing soot filter, an explanation by the independent California Licensed Mechanical Engineer as to the cause of this determination,
- if a piece of equipment is determined to be unsuitable for both an oxidizing soot filter and an oxidizing catalyst, an explanation by the independent California Licensed Mechanical Engineer as to the cause of this determination.

Installation Report

Following the installation of ~~either~~ the oxidizing soot filter ~~or oxidizing catalyst~~ as prescribed in the Initial Suitability Report, a California Licensed Mechanical Engineer will issue an Installation Report that either confirms that the installed device is functioning properly or that installation was not

possible and the cause. The installation report shall include copies of receipts of purchase or lease for the appropriate equipment and receipts of payments for labor if applicable.

Suitability Update Reports
If a piece of construction equipment is subsequently determined to be unsuitable for an oxidizing soot filter ~~or oxidizing catalyst~~ after such installation has occurred, the filter ~~or catalyst~~ may be removed immediately. However notification must be sent to the CPM for approval containing an explanation for the change in suitability within 10 days. Changes in suitability are restricted to three explanations which must be identified in any subsequent suitability report. Changes in suitability may not be based on the use of high-pressure fuel injectors, timing retardation and/or reduced idle time.

1. The filter or catalyst is excessively reducing normal availability of the construction equipment due to increased downtime, and/or power output due to increased back pressure.
2. The filter or catalyst is causing or reasonably expected to cause significant damage to the construction equipment engine.
3. The filter or catalyst is causing or reasonably expected to cause a significant risk to nearby workers or the public.

Verification: The project owner will submit to the CPM ~~and ARB~~ for approval, the Initial Suitability Report stamped by an independent California Licensed Mechanical Engineer, 30 days prior to breaking ground on the project site. The project owner will submit to the CPM ~~and ARB~~ for approval, the Installation Report stamped by an independent California Licensed Mechanical Engineer no later than 10 working day following the use of the identified equipment on site. The project owner will submit to the CPM ~~and ARB~~ for approval, Suitability Update Reports as required, stamped by an independent California Licensed Mechanical Engineer no later than 10 working day following a change in the suitability status of any construction equipment. . The CPM will monitor the approval of all reports submitted by the project owner in consultation with CARB, limiting the review time for any one report to no more than 20 working days.

AQ-C3 Prior to breaking ground at the project site, the project owner shall prepare a Construction Fugitive Dust Mitigation Plan that will specifically identify fugitive dust mitigation measures that will be employed for the construction of the Mountainview Power Plant and related facilities.

The Construction Fugitive Dust Mitigation Plan shall specifically identify measures to limit fugitive dust emissions from construction of the project site and linear facilities. Measures that should be addressed include the following:

- the identification of the employee parking area(s) and surface of the parking area(s);
- the frequency of watering of unpaved roads and disturbed areas;
- the application of chemical dust suppressants;
- the use of gravel in high traffic areas;
- the use of paved access aprons;
- the use of posted speed limit signs;
- the use of wheel washing areas prior to large trucks leaving the project site;
- the methods that will be used to clean tracked-out mud and dirt from the project site onto public roads; and,
- the use of on-site monitoring devices.

Verification: At least sixty (60) days prior to breaking ground at the project site, the project owner shall provide the CPM with a copy of the Construction Fugitive Dust Mitigation Plan for approval.

The following Conditions of Certification pertain to the following equipment:
1,991 MMBTU/HR Gas Turbine (ID No. D18) (A/N 366147) No. 3-1 GE Model 7FA with Dry Low NOx combustors connected directly to a 175.7 MW (nominal) Electric Generator (ID No. B19) and a Heat Recovery Steam Generator (ID No. B20) with 135 MMBTU/HR Duct Burners (ID No. D21) connected in common with Gas Turbine No. 3-2 to a 214.5 MW (nominal) steam turbine (ID No. B22). Selective Catalytic Reduction (ID No. C24) (A/N 366151) with 2750 cubic feet of total volume 72 feet height, 1.5 feet long, 25.6 feet wide with an ammonia injection grid (ID No. B25) and a CO oxidation catalyst (ID No. C23) with 240 cubic feet of total volume connected to an exhaust stack (ID No. S35) (A/N 366146) No 3-1/3-2.

1,991 MMBTU/HR Gas Turbine (ID No. D27) (A/N 366148) No. 3-2 GE Model 7FA with Dry Low NOx combustors connected directly to a 175.7 MW (nominal) Electric Generator (ID No. B28) and a Heat Recovery Steam Generator (ID No. B29) with 135 MMBTU/HR Duct Burners (ID No. D30) connected in common with Gas Turbine No. 3-1 to a 214.5 MW (nominal) steam turbine (ID No. B31). Selective Catalytic Reduction (ID No. C33) (A/N 366152) with 2750 cubic feet of total volume 72 feet height, 1.5 feet long, 25.6 feet wide with an ammonia injection grid (ID No. B34) and a CO oxidation catalyst (ID No. C32) with 240 cubic feet of total volume connected to an exhaust stack (ID No. S35) (A/N 366146) No 3-1/3-2.

1,991 MMBTU/HR Gas Turbine (ID No. D36) (A/N 366149) No. 4-3 GE Model 7FA with Dry Low NOx combustors connected directly to a 175.7 MW (nominal) Electric Generator (ID No. B37) and a Heat Recovery Steam Generator (ID No. B38) with 135 MMBTU/HR Duct Burners (ID No. D39) connected in common with Gas Turbine No. 4-4 to a 214.5 MW (nominal) steam turbine (ID No. B40). Selective Catalytic Reduction (ID No. C42) (A/N 366153) with 2750 cubic feet of total volume 72 feet height, 1.5 feet long, 25.6 feet wide with an ammonia injection grid (ID No. B43) and a CO oxidation catalyst (ID No. C41) with 240 cubic feet of total volume connected to an exhaust stack (ID No. S53) (A/N 366149) No 4-3/4-4.

1,991 MMBTU/HR Gas Turbine (ID No. D45) (A/N 366150) No. 4-4 GE Model 7FA with Dry Low NOx combustors connected directly to a 175.7 MW (nominal) Electric Generator (ID No. B46) and a Heat Recovery Steam Generator (ID No. B47) with 135 MMBTU/HR Duct Burners (ID No. D48) connected in common with Gas Turbine No. 4-3 to a 214.5 MW (nominal) steam turbine (ID No. B49). Selective Catalytic Reduction (ID No. C51) (A/N 366154) with 2750 cubic feet of total volume 72 feet height, 1.5 feet long, 25.6 feet wide with an ammonia injection grid (ID No. B52) and a CO oxidation catalyst (ID No. C50) with 240 cubic feet of total volume connected to an exhaust stack (ID No. S53) (A/N 366149) No 4-3/4-4.

AQ-1 During the final phase of construction, the operator shall be allowed to exceed normal operational and startup emission limits and operational constraints (**AQ-9, AQ-10, AQ-11, AQ-12, AQ-13** and **AQ-14**) and will be subject only to the limit prescribed in this Condition so that the turbine systems and controls can be fine tuned. This phase of construction is referred to herein as initial commissioning and shall be limited to no more that ~~66~~33 operating days duration following the date natural gas is first fired in any one of the four gas turbines.

If the turbine is loaded below 60%, the NOx emission ~~limit is~~factor used for RECLAIM purposes shall be 356 lbs/mmcf. If the turbine is loaded at or above 60%, the NOx emission ~~limit~~factor used for RECLAIM purposes shall be ~~is~~ 64 lbs/mmcf. ~~The total NOx emissions during initial commissioning shall not exceed 69,284 lbs.~~ No more than two turbine systems shall be in initial commissioning at one time. The project owner shall provide written notification to the District and California Energy Commission of the exact date natural gas is first fired in ~~any one~~ each of the four turbines, and the date, for each gas turbine, that commissioning activities are completed. ~~This date is referred to herein as first fire.~~

Verification: The project owner and/or operator (project owner) shall report the turbine loading conditions (as a percent of maximum), duration of loading conditions (hours), natural gas fuel consumption during loading conditions (mmcf) and total NOx emissions during loading conditions (lbs) from initial commissioning to the California Energy Commission Compliance Project Manager (CPM) for the four gas turbines and duct burners no later than 10 days following the termination of the initial commissioning period for the last gas turbine.

AQ-2 During the first 12 months of operation immediately following first fire, the project owner shall either (1) limit the annual natural gas fuel consumption for all four gas turbines and all four duct burners to no more than 35,000 MMCF or (2) demonstrate to the satisfaction of the South Coast Air Quality Management District (District) and the CPM that the total NOx emissions from all four gas turbines and duct burners will not exceed 250,302 pounds.

Verification: The project owner shall submit total NOx emissions and natural gas fuel consumption reports to the CPM for the four gas turbines and duct burners as part of the Quarterly Operational Reports as described in Condition **AQ-8**. Requests to increase this emission limit shall be submitted to the District and CPM, and shall be accompanied by documentation evidencing that the Project Owner has sufficient RTCs to support the request.

AQ-6 The project owner shall install, maintain and operate a continuous emissions monitoring system (CEMS) for each gas turbine exhaust stack to continuously measure the concentrations of NOx (in ppmv) and oxygen in ppmv, fuel flow rate, and operational status codes as defined in District Rule 2012 once every 15 minutes. In compliance with District Rule 2012, the project owner shall at least annually test the NOx CEMS for relative accuracy. The CEMS will convert the NOx concentrations to mass emissions and record NOx mass emissions hourly and daily. The CEMS shall be installed and operating no later than 12 months following first fire (District Rule 2021(h)(6)). From the time of first fire until the CEMS are certified, the project owner shall comply with the fuel monitoring requirements of District Rule 2012(h)(2) and 2012(h)(3).

Verification: The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-7 The project owner shall electronically report total daily mass emissions of NO_x and daily operational status codes to the District Central NO_x Station in compliance with District rule 2012 (c)(3)(A). ~~The project owner shall submit to the District Monthly Emissions Reports in the manner and form specified by the District within 15 calendar days of the close of each of the first eleven months of the compliance year (District Rule 2012(c)(3)(B)). The Monthly Emissions Report will include mass emissions of NOx on a monthly, daily and hourly basis within the reporting period.~~

Verification: The project owner shall submit to the District Monthly Emissions Reports in the manner and form specified by the District within 15 calendar days of the close of each of the first eleven months of the compliance year (District Rule 2012(c)(3)(B)). The Monthly Emissions Report will include mass emissions of NOx on a monthly, daily and hourly basis within the reporting period.The project owner shall submit the Monthly Emissions Report to the CPM as part of the Quarterly Operational Report (see **AQ-8**).

AQ-10 Startup is defined for a gas turbine/HRSG train as beginning when ~~the SCR of two gas turbines connected to a common steam turbine have reach 500 ^{o}F (see **AQ-9**) and ending when both gas turbines have reached stable operational conditions~~fuel is introduced into the turbine's combustor, and ending immediately prior to the first 15-minute period when both the NOx and CO limits in Conditions AQ-11 are met.

Shutdown is defined for a gas turbine/HRSG train as beginning at the start of the first 15-minute period when the NOx and CO limits in Condition AQ-11 are not met, and ending with the flow of fuel to the turbine's combustor ceasesnormal operating temperatures for two gas turbines connected to a common steam turbine and ending at the secession of fuel burning for both gas turbines. No more than two gas turbines shall be in startup mode at one time. The total duration of sStartups and shutdowns shall not exceed 3 hours per gas turbine/HRSGin duration per day. While any gas turbine is in startup mode, the NOx emissions from all four turbines combined shall be limited to 75.54 lbs/hr. While any gas turbine is in startup mode, the NOx and CO emission limits in Condition **AQ-11** shall not apply.

Verification: The project owner shall submit fuel use, NOx emissions and operational status on an hourly basis during each startup or shutdown for each gas turbine in the Quarterly Operational Reports (see **AQ-8**).

AQ-11 Except during startup, shutdown and initial commissioning, emission from each gas turbine exhaust stack shall not exceed the following limits:

NOx (measured as NO2):	2.5 ppm at 15% oxygen on a dry basis averaged over one hour and 17.77 lbs/hour.
CO:	6 ppm at 15% oxygen on a dry basis averaged over 3 hours and 25.91 lbs/hr.
SOx (measured as SO2):	0.67 lbs/mmscf1.42 lbs/hr
VOC:	1.64 lbs/mmscf3.47 lbs/hr
PM10:	5.21 lbs/mmscf11.0 lbs/hr
Ammonia:	5 ppm at 15% oxygen on a dry basis.

Verification: The project owner shall submit emission calculations to demonstrate compliance for the NOx and CO limits in the Quarterly Operational Reports (see **AQ-8**) and source tests, as required in Condition **AQ-15, AQ-16** and **AQ-17**, to demonstrate compliance with SOx, VOC and PM10 emission limits.

AQ-13 Except for initial commissioning, but including startup and shutdowns, the emissions from each gas turbine exhaust stack shall not exceed the following limits:

NOx (measured as NO2):	2 ppm at 15% oxygen averaged over a year excluding periods of startup and shutdown as defined in Conditions AQ-10 and 125.1558.9 tons per year including periods of startup and shutdown as defined in Conditions AQ-10.

Verification: The project owner shall submit all necessary data and emission calculations electronically to the CPM in the fourth Quarter Operation Report only (**AQ-8**) to verify compliance of the annual emission limits including the identification of all RECLAIM Trading Credits purchased to offset the facility NOx emissions.

The following Conditions of Certification pertain to the following equipment:
The two cooling towers associated with the new gas turbine units (Units 3 and 4), each are 147,000 gal/min in capacity, have 10 cells, two rows side-by-side, forced vent and have a drift rate of 0.0006%.

~~The two cooling towers associated with the existing boilers units (Units 1 and 2), each are 38,700 gal/min in capacity, have 4 cells, inline, forced vent and have a drift rate of 0.0006%.~~

AQ-29 For the two cooling towers associated with Units 3 and 4, ~~The~~the project owner shall submit drift eliminator design details and vendor specific justification for the correction factor to be used to correlate blowdown TDS to drift TDS and the amount of drift that stays suspended in the atmosphere in the equation in Condition **AQ-34** to the Commission at least 30 days prior to commencement of construction.

Verification: 30 days prior to commencement of construction of the cooling towers, the project owner shall submit the information required above to the CPM.

AQ-30 For the two cooling towers associated with Units 3 and 4, ~~The~~the project owner shall submit cooling tower design details including the cooling tower type and materials of construction to the Commission at least 30 days prior to commencement of construction, and at least 90 days before the tower is operated.

Verification: The project owner shall submit the information required above to the CPM 30 days prior to the commencement of construction of the cooling towers.

AQ-32 The project owner shall design and build the cooling towers for units 3 and 4 such that the drift eliminator drift rate of the cooling towers does not exceed 0.0006%.

Verification: The project owner shall submit documentation from the selected cooling tower vendor that verifies the drift efficiency to the CPM 30 days prior to commencement of construction of the cooling towers.

AQ-33 The project owner shall limit the PM10 emissions from the cooling towers associated with units 3 and 4 as follows:

Each 10 cell cooling tower is not to exceed 70.1 lbs/day.
~~Each 4 cell cooling tower is not to exceed 18.5 lbs/day.~~

Verification: The project owner shall submit data and calculations on annual basis to the CPM as discussed in condition **AQ-34**.

AQ-35 The project owner shall perform circulating water sample analyses by independent laboratory within 90 days of initial operation and weekly thereafter to determine the TDS within the cooling tower water. Alteratively, the project owner shall continuously measure cooling tower basin water conductivity for use in the calculation required by condition AQ-34.

Verification: The project owner shall compile the required analyses and maintain the data on site for a minimum period of two years. The project owner shall make the site available for inspection by representatives of the District, CARB, EPA or the Commission.

AQ-36 The gas turbines shall not be operated unless the operator demonstrates to the District that the facility holds sufficient RTCs to offset the prorated annual emissions increase for the first compliance year of operation. In addition, the gas turbines shall not be operated unless the operator demonstrates to the District that, at the commencement of each compliance year after the first compliance year of operation, the facility holds sufficient RTCs in an amount equal to the annual emission increase.

Verification: The project owner shall submit to the CPM copies of all RECLAIM reports filed with the District in each ~~records of all RTCs, including the initial allocation to the existing boilers, deposited for the Mountainview facility to the CPM in the fourth~~ Quarterly Operational Report (see **AQ-8**).

~~**AQ-37** Except for open abrasive blasting operations, the project owner shall shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:~~

~~(a) As dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or~~
~~(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.~~

~~**Verification:** The project owner shall make the site available for inspection by representatives of the District, CARB, EPA or the Commission.~~

~~**AQ-38** The project owner shall limit the Acid Rain SO2 Allowance for the affected units as follows:~~

~~Device ID~~	~~Boiler ID~~	~~Contaminant~~	~~Tons in any year~~

D1	Boiler Unit No. 1	SO2	117
D2	Boiler Unit No. 2	SO2	17

Verification: The project owner shall demonstrate compliance through the submittal of Quarterly Operational Reports as required by condition **AQ-8**.

The following Conditions of Certification pertain to the following equipment: Boiler Unit No. 1, Natural gas combustion engineering, eight burners, Peabody, 680 MMBtu/hr with generator, 63 MW. A/N 368336 (ID No. D1).

Boiler Unit No. 2, Natural gas combustion engineering, eight burners, Peabody, 680 MMBtu/hr with generator, 63 MW. A/N 368334 (ID No. D2).

AQ-39 The project owner shall burn only natural gas containing sulfur compounds calculated as H_2S in excess of 16 parts per million by volume (ppmv) or cause CO emissions to exceed 2,000 ppm by volume measured on a dry basis, averaged over 15 consecutive minutes in either boiler unit 1 or 2.

Verification: The project owner shall maintain appropriate records on site for a minimum of five years and make them available for inspection by request from representatives of the District, CARB, EPA or the Commission.

AQ-40 The project owner shall not discharge into the atmosphere from the burning of fuel, combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO2) at standard conditions averaged over a minimum of 15 consecutive minutes.

Verification: The project owner shall maintain appropriate records on site for a minimum of five years and make them available for inspection by request from representatives of the District, CARB, EPA or the Commission.

AQ-41 The project owner shall install, maintain and operate a direct monitoring device (CEMS) for each boiler exhaust stack to continuously measure the concentration of NO_x emissions and all other applicable variables specified in District Rule 2012. In compliance with District Rule 2012, the project owner shall at least annually test the NOx CEMS for relative accuracy. The CEMS will convert the NOx concentrations to mass emissions and record NOx mass emissions hourly and daily. The CEMS shall electronically report total daily mass emissions of NO_x and daily status codes to the District Central NO_x Station for each boiler exhaust stack.

Verification: The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-42 The project owner shall submit to the Commission, Quarterly Operational Reports that include the fuel use associated with each boiler unit, in addition to the NOx CEMS recorded data for each boiler exhaust stack (see **AQ-41**) on an hourly basis.

Verification: The project owner shall submit the Quarterly Operational Reports to the CPM no later than 30 days following the end of each calendar quarter (see **AQ-8**).

AQ-43 Immediately following the completion of initial commissioning of all four gas turbines, the project owner shall limit the emissions of NOx from both boilers systems, Units 1 and 2 combined, to no more than 65.3 lbs/hr during all modes of operation, including startup and shutdown.

Verification: The project owner shall submit emission calculations and records from the existing CEMS on the boiler systems, Units 1 and 2, to demonstrate compliance for the NOx limit in the Quarterly Operational Reports (see **AQ-8**).

AQ-44 The project owner shall submit designs and vendor guarantees for any emission control systems or measures intended to reduce NOx emissions from the existing boiler systems, Units 1 and 2, to meet the emission limits specified in Condition **AQ-43**.

Verification: The project owner shall submit the identified designs and vendor guarantees to the CPM for approval, no later than 30 days prior to the completion of initial commissioning of the four proposed gas turbines. The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

The following Conditions of Certification pertain to the following equipment: Storage tank, underground, gasoline with vapor lock balance recovery system, 2000 gallons A/N 364670 (ID No. D7).

Fuel dispensing nozzle, balance type phase II control, gasoline A/N 364670 (ID No. D8).

AQ-47 The project owner shall ensure that the gasoline storage tank and dispensing nozzle comply with District Rule 461.

Verification: The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-48 The project owner shall use the phase I vapor recovery system in full operation whenever the gasoline storage tank is in use. This system shall be installed, operated and maintained to meet all CARB certification requirements.

Verification: The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-49 The project owner shall use the phase II vapor recovery system in full operation whenever gasoline from the gasoline storage tank is dispensed to motor vehicles as defined in District Rule 461. This system shall be installed, operated and maintained to meet all CARB certification requirements.

Verification: The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-50 The project owner shall have a person trained in accordance with District Rule 461 (c)(6) conduct a semi-annual inspection of the gasoline transfer and dispensing equipment. The first inspection shall be in accordance with District Rule 461, Attachment C, the second inspection shall be in accordance with District Rule 461, Attachment D, and the subsequent inspections shall alternate protocols. The operator shall keep records of the inspection and the repairs in accordance to District Rule 461 and Section K of the District Permit to Operate for the gasoline storage tank.

Verification: The project owner shall maintain records on site and make them available for inspection by representatives of the District, CARB, EPA and the Commission.

The following Conditions of Certification pertain to the following equipment: Abrasive blasting equipment, Glove box <= 53 C Ft with dust filter (ID No. E14)

Oil water separators, gravity type, <45 Sq. Ft air liquid interface area (ID No. E15)

Coating equipment, portable architectural coatings (ID No. E16)

AQ-51 The project owner shall keep records in manner approved by the District for the following parameters or items concerning the abrasive blasting equipment:

- The name of the person performing the inspection and/or maintenance of the dust collector,
- The date, time and results of the inspection, and
- The date time and description of any maintenance or repairs resulting from the inspection.

Verification: The project owner shall maintain records on site and make them available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-52 The project owner shall perform annual inspections of the abrasive blasting equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

Verification: The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-53 The project owner shall conduct an inspection for visible emissions from all points of the abrasive blasting equipment whenever these is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of the Permit to Operate for the Mountainview Facility.

The project owner shall keep the records in accordance with the record keeping requirements in Section K of the Permit to Operate of the Mountainview Facility and the following records:

- Stack or emission point identification
- Description of any corrective actions taken to abate visible emissions; and
- Date and time visible emission was abated.

Verification: The project owner shall maintain records on site and make them available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-54 The project owner shall ensure that the oil water separators comply with District Rule 464.

Verification: The project owner shall make the site available for inspection by representatives of the District, CARB, EPA and the Commission.

AQ-55 The project owner shall keep records in a manner approved by the District for the following parameters or items concerning the portable coating equipment:

For architectural applications where no thinners, reducers or other VOC containing materials are added, maintain semi-annual record for all coatings consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content

as supplied in g/l of coating, less water and exempt solvents for other coatings.

For architectural applications where thinners, reducers or other VOC containing materials are added, maintain daily record for all coatings consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvents for other coatings.

Verification: The project owner shall maintain records on site and make them available for inspection by representatives of the District, CARB, EPA and the Commission.